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16 *and Proposed Co-Lead Counsel*
17 [Additional Counsel on Signature Page]

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 ANIKA R. RIECKBORN, Individually and
21 on Behalf of All Others Similarly Situated,

22 Plaintiff,

23 v.

24 VELTI PLC, ALEX MOUKAS, WILSON
25 W. CHEUNG and JEFFREY G. ROSS,

26 Defendants.

27 No. 3:13-cv-03889-WHO

28 **NOTICE OF NON-OPPOSITION OF
NIGEL HOPKINSON AND NICOLA
HOPKINSON TO COMPETING
MOTIONS FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD COUNSEL**

Hon. William H. Orrick
Date: Nov. 27, 2013
Time: 9:00 a.m.

29
30 [Captions Continue on Next Page]

CHRIS VAFINIS, Individually and on Behalf of All Other Persons Similarly Situated,

No. 4:13-cv-03954-YGR

Plaintiff,

V.

VELTI PLC, ALEX MOUKAS, WILSON
W. CHEUNG and JEFFREY G. ROSS,

Defendants.

HAN LEE, Individually and On Behalf Of
All Others Similarly Situated,

No. 3:13-cv-04140-SI

Plaintiff,

V.

VELTI PLC, ALEX MOUKAS, WILSON
W. CHEUNG and JEFFREY G. ROSS,

Defendants.

RAYMUND MANABAT, Individually and
On Behalf Of All Others Similarly Situated,

No. 3:13-cv-04606-JSC

Plaintiff.

V.

VELTI PLC, ALEX MOUKAS, WILSON
W. CHEUNG, JEFFREY G. ROSS,
WINNIE W. TSO, CHRIS KASKAVELIS,
DAVID W. MANN, DAVID C. HOBLEY,
JERRY GOLDSTEIN, NICHOLAS P.
NEGROPONTE, JEFFERIES &
COMPANY INC., RBC CAPITAL
MARKETS LLC, NEEDHAM &
COMPANY LLC, CANACCORD
GENUITY INC. and THINKEQUITY LLC

Defendants.

1 **TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

2 **PLEASE TAKE NOTICE** that lead plaintiff movants Nigel Hopkinson and Nicola
 3 Hopkinson (the “Hopkinsons”) do not oppose the competing motions filed October 21, 2013
 4 for consolidation of the above-captioned actions, appointment as lead plaintiff and approval of
 5 lead counsel. Having reviewed the competing motions and supporting papers, it appears that
 6 the Hopkinsons do not possess the “largest financial interest in the relief sought by the class,”
 7 as required by the PSLRA. However, were the Court to determine that the other lead plaintiff
 8 movants with larger losses than the Hopkinsons are incapable or inadequate to represent the
 9 class in this litigation, movants Nigel Hopkinson and Nicola Hopkinson continue to be willing
 10 and able to serve as lead plaintiff or as class representatives.

11 By this Notice of Non-Opposition, the Hopkinsons do not waive their rights to
 12 participate and recover as class members in this litigation, and Nigel Hopkinson and Nicola
 13 Hopkinson remain ready, willing and able to serve as lead plaintiff if the need arises.

14 Dated: November 5, 2013

15 **GLANCY BINKOW & GOLDBERG LLP**

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NOTICE OF NON-OPPOSITION TO COMPETING MOTIONS FOR CONSOLIDATION, APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL

No. 3:13-cv-03889-WHO

- 2 -

PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO NORTHERN DISTRICT OF CALIFORNIA LOCAL RULES AND LOCAL CIVIL RULE 5-1

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1925 Century Park East, Suite 2100, Los Angeles, California 90067.

On November 5, 2013, I caused to be served the following document:

**NOTICE OF NON-OPPOSITION OF NIGEL HOPKINSON AND NICOLA
HOPKINSON TO COMPETING MOTIONS FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

By posting the document to the ECF Website of the United States District Court for the Northern District of California, for receipt electronically by the parties as listed on the attached Court's ECF Service List.

And on any non-ecf registered party:

By U.S. Mail: By placing true and correct copies thereof in individual sealed envelopes, with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 5, 2013, at Los Angeles, California.

s/ Michael Goldberg
Michael Goldberg

Mailing Information for a Case 3:13-cv-03889-WHO

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)